UNITED STATES DISTRICT COURT

FILED

| May | 05 | 2025 |
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| for the | May 03, 2023 |
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| Western District of Texas | CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS |
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Case No. **SA:25-MJ-703**

| | Defendant(s) | | |
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| | | CRIMIN | AL COMPLAINT |
| I, the complai On or about the date(s | | ase, state that the fo | ollowing is true to the best of my knowledge and belief. in the county of Bexar in the |
| Western Dis | strict of | Texas | _ , the defendant(s) violated: |
| Code Section | on | | Offense Description |
| Penalties: Ma | | Illegal Reentr | y |
| | | Penalties: Ma | ximum Penalties: 10 years confinement, \$250,000 Fine or |
| | | Both; 3 years | supervised release, \$100 mandatory special assessment. |
| SEE ATTACHED A | | hed sheet. | |
| | | | Complainant's signature Michela Johnson, Deportation Officer |
| Sworn to before m Sworn to telephon | | | Printed name and title |
| Date: May 5, 2025 | | | Judge's signature |
| City and state: | San A | Antonio, Texas | Honorable Richard B. Farrer, U.S. Magistrate Judge Printed name and title |

Being duly sworn, I declare that the following is true and correct to the best of my knowledge:

My name is Michela Johnson, and I am a Deportation Officer with Immigration and Customs Enforcement ("ICE") Enforcement Removal Operations ("ERO"), with whom I have been employed since January 22, 2019. I am authorized by the United States Department of Homeland Security to enforce the Immigration Laws and Regulations of the United States, or any other Laws or Regulations designated by the Attorney General or his successor, the Secretary of the Department of Homeland Security.

On May 4, 2025, an investigation commenced on Efren JIMENEZ-Moran (hereafter "JIMENEZ"), pursuant to a traffic stop initiated by the Bexar County Sheriff's Office (BCSO), in San Antonio (Bexar County), Texas, located within the Western District of Texas. BCSO commenced a traffic stop on JIMENEZ for "Failure to Maintain a Single Lane." BCSO contacted ICE ERO inquiring about JIMENEZ's immigration status in the United States, and ICE ERO dispatched officers to further investigate. Upon arrival, ICE ERO identified themselves to JIMENEZ and found that he is a citizen and national of Mexico who has not obtained permission to enter, pass through, or remain in the United States from an immigration official. JIMENEZ was subsequently arrested by ICE ERO and transported to the ICE ERO San Antonio Office for processing.

At the ICE ERO office, JIMENEZ's fingerprints were enrolled and submitted through immigration and FBI databases, which verified his identity. The databases revealed that JIMENEZ is a citizen and national of Mexico with assigned Alien Registration Number A-XXX-XXX-311. A review of A-XXX-XXX-311 in the Enforce Alien Removal Module ("EARM"), a Department of Homeland Security database, revealed that JIMENEZ is an alien who was previously removed from the United States to Mexico on or about October 26, 2023.

A review of JIMENEZ's criminal history revealed that on February 3, 2021, he was convicted in the United States District Court, Southern District of Texas, Holding Session in Corpus Christi, of 8 U.S.C. § 1326(a), Illegal Re-Entry, and was sentenced to Time Served.

Immigration databases revealed that JIMENEZ has not been granted permission to reapply for admission from the Attorney General of the United States, or his successor, after his removal.

On May 5, 2025, the defendant was informed of his right to a consular notification and was provided an opportunity to call the Consulate General of Mexico upon his arrest. On May 5, 2025, the Consulate General of Mexico was notified of JIMENEZ's arrest. An immigration detainer will be filed with the U.S. Marshals Service on May 5, 2025.

Michela Johnson

Deportation Officer

Immigration and Customs Enforcement

Subscribed and sworn before me the 5th day of May 2025.

HONORABLE RICHARD B. FARRER UNITED STATES MAGISTRATE JUDGE